

ACLU Foundation of Massachusetts
211 Congress Street
Third Floor
Boston, MA 02110

Invoice submitted to:
Cocroft

Matthew Segal

April 14, 2015

Invoice #10024

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2012 Review complaint, appeals court decision, and email regarding the these topics.	1.00 350.00/hr	350.00
4/12/2012 Review Transcripts.	2.50 350.00/hr	875.00
4/25/2012 Review video and work on outline; email to Beverly Chorbajian and Michael Altman.	2.50 350.00/hr	875.00
4/27/2012 Conference with John Reinstein about the case and review emails.	0.50 350.00/hr	NO CHARGE
5/1/2012 Prepare documents and email for Michael Altman.	0.30 350.00/hr	NO CHARGE
5/2/2012 Correspondence regarding deposition.	0.50 350.00/hr	175.00
5/21/2012 Correspondence regarding depositions.	0.20 350.00/hr	NO CHARGE
5/24/2012 Review trial transcripts.	2.50 350.00/hr	875.00
5/29/2012 Deposition preparation.	0.50 350.00/hr	NO CHARGE
6/1/2012 Review Michael Altman's summary of Ms. Cocroft's testimony, and other emails. Emails to Michael Altman and Beverly Chorbajian.	2.00 350.00/hr	700.00

	<u>Hrs/Rate</u>	<u>Amount</u>
6/5/2012 Review Reichle v. Howards; correspondence with Altman and Chorbajian regarding same.	1.50 350.00/hr	525.00
6/7/2012 Research and emails re depositions.	0.30 350.00/hr	NO CHARGE
7/3/2012 Review Dowd deposition.	1.00 350.00/hr	NO CHARGE
7/10/2012 Review Dowd Irog answer; review emails on status conference.	0.30 350.00/hr	NO CHARGE
7/23/2012 Review opposition to motion to compel; research same; emails to Chorbajian, Altman,	2.00 350.00/hr	700.00
7/24/2012 Draft and revise reply in support of motion to compel.	2.50 350.00/hr	875.00
7/25/2012 Further revise reply.	1.30 350.00/hr	455.00
8/13/2012 Correspondence with Chorbajian about email from Attorney Quinn.	0.20 350.00/hr	NO CHARGE
8/15/2012 Review Defendant's summary judgment motion.	1.50 350.00/hr	525.00
8/29/2012 Review drafts of statement of disputed facts; email to Chorbajian regarding same.	1.50 350.00/hr	525.00
8/30/2012 Conference with Altman and Chorbajian; review emails; legal research.	4.50 350.00/hr	1,575.00
9/4/2012 Research and draft opposition brief; review research from law student D. Rini.	3.00 350.00/hr	1,050.00
9/5/2012 Research and draft opposition brief.	5.00 350.00/hr	1,750.00
9/6/2012 Research and draft opposition brief; review draft from D. Rini; confer with Rini re same.	6.00 350.00/hr	2,100.00
9/7/2012 Draft opposition brief.	2.00 350.00/hr	700.00
9/9/2012 Draft opposition brief.	2.00 350.00/hr	700.00
9/10/2012 Draft opposition brief; circulate rough draft to Chorbajian and Altman.	7.00 350.00/hr	2,450.00

	<u>Hrs/Rate</u>	<u>Amount</u>
9/11/2012 Revise draft of disputed facts; emails re same; review court order.	1.00 350.00/hr	350.00
9/12/2012 Correspondence regarding facts and letter from Attorney Quinn.	1.50 350.00/hr	NO CHARGE
9/18/2012 Correspondence with Chorbajian and Altman regarding opposition brief.	0.20 350.00/hr	NO CHARGE
10/10/2012 Correspondence with Chorbajian and Altman regarding opposition brief.	0.20 350.00/hr	NO CHARGE
10/15/2012 Correspondence with Chorbajian and Altman regarding opposition brief.	0.70 350.00/hr	NO CHARGE
10/17/2012 Draft opposition to summary judgment and revise statement of disputed facts.	9.00 350.00/hr	3,150.00
10/18/2012 Draft opposition to summary judgment and revise statement of disputed facts.	10.00 350.00/hr	3,500.00
10/19/2012 Correspondence with Chorbajian and Altman regarding filings.	0.20 350.00/hr	NO CHARGE
11/5/2012 Review Smith's response to summary judgment opposition.	1.00 350.00/hr	350.00
11/8/2012 Prepare for summary judgment hearing.	1.00 350.00/hr	350.00
11/9/2012 Prepare for summary judgment hearing.	0.50 350.00/hr	175.00
11/15/2012 Prepare for summary judgment hearing.	4.00 350.00/hr	1,400.00
11/16/2012 Prepare for summary hearing; review memo from law students D. Rini and T. Kates.	4.00 350.00/hr	1,400.00
11/19/2012 Prepare for summary judgment hearing.	5.00 350.00/hr	1,750.00
11/20/2012 Prepare for summary judgment hearing.	2.50 350.00/hr	NO CHARGE
11/25/2012 Prepare for summary judgment hearing.	3.00 350.00/hr	NO CHARGE
11/26/2012 Prepare for summary judgment hearing.	3.50 350.00/hr	NO CHARGE

	<u>Hrs/Rate</u>	<u>Amount</u>
11/27/2012 Prepare for summary judgment hearing.	4.00 350.00/hr	1,400.00
11/28/2012 Prepare for summary judgment hearing.	1.50 350.00/hr	525.00
11/29/2012 Prepare for summary judgment hearing.	3.00 350.00/hr	NO CHARGE
11/30/2012 Prepare for summary judgment hearing.	4.00 350.00/hr	1,400.00
12/2/2012 Prepare for summary judgment hearing.	4.50 350.00/hr	1,575.00
12/3/2012 Prepare for summary judgment hearing; meet with Altman.	8.00 350.00/hr	2,800.00
12/4/2012 Prepare for summary judgment hearing; travel to and from court; and argue summary judgment motion.	4.00 350.00/hr	1,400.00
12/5/2012 Emails following up on summary judgment.	0.20 350.00/hr	NO CHARGE
12/6/2012 Emails following up on summary judgment hearing.	0.20 350.00/hr	NO CHARGE
3/29/2013 Review order denying summary judgment.	0.50 350.00/hr	NO CHARGE
4/3/2013 Correspondence with Altman, Chorbajian, Reinstein, and Wunsch re: mediation.	0.30 350.00/hr	105.00
6/24/2013 Correspondence with client re: mediation.	0.20 350.00/hr	70.00
6/25/2013 Telephone call with client; follow-up emails to client, Altman, and Chorbajian.	1.20 350.00/hr	420.00
6/27/2013 Telephone call with client; follow-up emails to Altman and Chorbajian.	1.00 350.00/hr	350.00
6/28/2013 Correspondence with Reinstein, and Wunsch re: settlement.	0.20 350.00/hr	70.00
7/1/2013 Prepare letter to client; confer with Altman and Chorbajian re: trial strategy; emails to Altman, Chorbajian, Reinstein, and Wunsch re: same.	1.00 350.00/hr	350.00
7/4/2013 Email correspondence with client.	0.10 350.00/hr	35.00

	<u>Hrs/Rate</u>	<u>Amount</u>
7/5/2013 Telephone call with client re: letter.	0.20 350.00/hr	70.00
7/8/2013 Review and respond to correspondence from client. Confer with Altman and Wunsch re next steps.	0.50 350.00/hr	175.00
7/9/2013 Correspondence with Chorbajian and Altman re: trial strategy.	0.20 350.00/hr	70.00
7/13/2013 Revise and send letter to client re: next steps.	1.00 350.00/hr	350.00
7/17/2013 Review defendant's motion for miscellaneous relief.	0.20 350.00/hr	NO CHARGE
9/6/2013 Correspondence with Altman, Chorbajian, and Carl Williams re: trial strategy.	0.10 350.00/hr	NO CHARGE
2/14/2014 Confer with Williams re: trial; correspondence re: same.	0.30 350.00/hr	105.00
2/28/2014 Draft jury instructions, verdict form and response to defendants motion to strike.	3.00 350.00/hr	1,050.00
3/7/2014 Draft jury instructions, verdict form and response to defendants motion to strike.	0.80 350.00/hr	280.00
3/25/2014 Travel to and from Worcester.	2.00 350.00/hr	NO CHARGE
Attend trial.	4.00 350.00/hr	NO CHARGE
Prepare memo to Williams re: closing argument; review and draft opposition to defendants motion for judgment as a matter of law; discussions and correspondence with Williams and Mack re: same	4.50 350.00/hr	1,575.00
3/26/2014 Travel to and from Worcester.	2.00 350.00/hr	NO CHARGE
Attend trial.	4.00 350.00/hr	NO CHARGE
Draft, finalize, and file opposition to defendants motion for judgment as a matter of law; correspondence with Mack, Chorbajian, and Williams re: same.	3.50 350.00/hr	1,225.00
3/27/2014 Legal research re: jury question; correspondence with Williams, Chorbajian, and Mack re: same. Phone call with Williams re: next steps.	1.50 350.00/hr	525.00
4/9/2014 Research on exit orders; memo to Altman, Wunsch, and Chorbajian regarding same.	3.00 350.00/hr	1,050.00

	<u>Hrs/Rate</u>	<u>Amount</u>
4/21/2014 Review defendant's motion for judgment notwithstanding the verdict.	1.00 350.00/hr	350.00
Research and draft outline of response to defendant's post-trial motion; send to C. Williams and M. Mack; review correspondence regarding same from M. Mack.	2.00 350.00/hr	700.00
4/22/2014 Confer with D. Marx, C. Rauscher, and R. Richardson regarding affidavits in support of fee application.	0.75 350.00/hr	262.50
4/23/2014 Prepare affidavit in support of fee request; confer with C. Williams and B. Chorbajian regarding same.	2.50 350.00/hr	875.00
4/24/2014 Confer with S. Wunsch, C. Williams, and M. Mack about opposition brief.	0.30 350.00/hr	105.00
4/25/2014 Confer with M. Mack regarding opposition brief; review jury instructions as delivered.	0.20 350.00/hr	70.00
4/29/2014 Research and draft opposition to Smith's renewed motion for judgment as a matter of law.	3.80 350.00/hr	1,330.00
4/30/2014 Draft opposition to Smith's renewed motion for judgment as a matter of law.	5.20 350.00/hr	1,820.00
5/1/2014 Revise opposition to Smith's renewed motion for judgment as a matter of law. Confer with M. Mack and C. Williams regarding same.	4.00 350.00/hr	1,400.00
5/2/2014 Conference call with M. Mack and C. Williams regarding further revision of draft opposition.	0.30 350.00/hr	105.00
6/13/2014 Confer with C. Williams, B. Chorbajian, M. Altman regarding argument on post-hearing motion.	0.20 350.00/hr	70.00
6/14/2014 Prepare for hearing on Smith's JNOV motion.	2.00 350.00/hr	700.00
6/15/2014 Prepare for hearing on Smith's JNOV motion.	2.00 350.00/hr	700.00
6/16/2014 Prepare for hearing on Smith's JNOV motion.	3.50 350.00/hr	1,225.00
6/17/2014 Prepare for hearing on Smith's JNOV motion; moot court re same.	4.50 350.00/hr	1,575.00
6/18/2014 Prepare for and present oral argument on Smith's JNOV motion.	2.50 350.00/hr	875.00
6/19/2014 Prepare and submit follow-up letter to court regarding cases discussed at hearing on Smith's JNOV motion.	0.60 350.00/hr	210.00

	<u>Hrs/Rate</u>	<u>Amount</u>
4/9/2015 Revise motion, memorandum of law, and affidavit in support of fees petition; confer with C. Williams re same.	1.75 350.00/hr	612.50
For professional services rendered	203.20	\$60,165.00
Balance due		<u>\$60,165.00</u>